

CITIZENS CONSULTING, INC.
LEGAL DEPARTMENT
1024 Elysian Fields Avenue
New Orleans, Louisiana 70117

Hollis Shepherd

Telephone: 504-943-8934
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April 11, 2008

Federal Election Commission
Enforcement Division
999 E. Street N.W.
Washington D.C. 20463

Re: MUR 5970

Dear Mr. Jeff Jordan:

In response to your February 5, 2008 notice concerning MUR 5970, we have reviewed a complaint filed by Lori Sherwood and have determined that: (1) although your February 5, 2008 notice says the Federal Election Commission received a complaint that *indicates* Citizens Consulting may have violated the Federal Election Campaign Act of 1971, MUR 5970 doesn't contain any statements or documentation indicative of a violation of the Federal Election Campaign Act of 1971; and (2) Sherwood's complaint does not even mention Citizens Consulting Incorporated (CCI). More importantly, the opening paragraphs of Ms. Sherwood's complaint are as follows:

"I, Lori Sherwood, of _____, Rockville, Maryland 20853, am an adult citizen of the state of Maryland. I am filing the within complaint with your office as it is my belief that violations of the Federal Election Campaign Laws and Commission Regulations have occurred.

Based on my examination of various records and documents I believe Donna Edwards for Congress Committee ("Edwards Campaign") has received substantial assistance by way of unreported, in-kind contributions from organizations who profess to have operated independently of the Edwards Campaign.

More specifically:"

In each of the thirty-four paragraphs in which Ms. Sherwood specifically outlines her complaint about various organizations and their suspected violations of the FECA and Commission Regulations, there is no allegation or documentation that CCI committed any of the acts specifically outlined by Ms. Sherwood. In fact, CCI isn't even mentioned. The solitary mention of CCI is in an attached printout from the Louisiana Secretary of State Corporations Database. This attachment indicates that CCI is a corporation in good standing in the state of Louisiana. It identifies its registered agent and address, and the mailing and domicile address of CCI. None of these facts could possibly amount to a violation of FECA.

Ms. Sherwood talks at great length about the different organization sharing an address of 1024 Elysian Fields Avenue in New Orleans. Ms. Sherwood seems to think this is somehow

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suggestive of illegality. Although this idea is patently absurd, it may be helpful to the Commission to explain why these organizations share a common address.

1024 Elysian Fields is the principal place of business of CCI.¹ CCI provides consulting services to a large number of client organizations, most of them nonprofit corporations. These services include administrative, financial, bookkeeping, and legal support. Because it houses the administrative and accounting functions for these client organizations, they all report the CCI address as their contact address for administrative and similar functions. The common contract address merely indicates shared administrative functions.

Given the above, CCI is puzzled by both this complaint and the letter it received from the Commission because, as mentioned above, the complaint does not make reference to CCI, except for the solitary attachment from the Louisiana Secretary of State Corporations Database.

We would also like to clarify the timing of our request for additional time to respond to this complaint. Although the date stamp from your office indicates it was sent out February 5, 2008, the documentation from CCI's registered agent (enclosed) indicates it was received March 3, 2008. Therefore the 15 day deadline would have required a response by March 18, the day we requested an extension of 30 days. While we are pleased to be able to submit this response by the new date of March 24, we wanted to clarify that our request was not, in fact, filed after the deadline had passed. We apologize for any confusion in this regard and appreciate your courtesy and understanding.

Because the complaint does not contain specific allegations, statements, or documentation that CCI violated the Federal Elections Campaign Act of 1971 or any of the Commission's regulations, the Commission should find no reason to believe that a violation has occurred and dismiss this complaint.

If you should have any questions, please do not hesitate to call or contact me.

Thanking you in advance,


Hollis Shepherd

¹ In fact, this is no longer the case, as CCI recently moved its offices. However, at the time of the events in question and when this complaint was filed, the offices were still at the old address.